

CHAPTER 186 CERTIFICATE FAR PART 147 AVIATION MAINTENANCE TECHNICIAN SCHOOL

Section 1 Background

1. PTRS ACTIVITY CODES

A. *Maintenance*. 3230

B. *Avionics*. 5230

3. OBJECTIVE. This chapter provides guidance for certificating an Aviation Maintenance Technician School under FAR Part 147.

5. GENERAL

A. *Certification Process.* The certification process provides for interaction between the applicant and the FAA from initial inquiry to certificate issuance. It ensures that programs, systems, and methods of compliance are thoroughly reviewed, evaluated, and tested. The certification process consists of the following five phases:

- Preapplication Phase
- Formal Application Phase
- Document Compliance Phase
- Demonstration and Inspection Phase
- Certification Phase

B. *Authority.* Sections 313(a), 314, 601, and 607 of the Federal Aviation Act of 1958, as amended, and FAR Part 147 provide regulatory authority for certificating Aviation Maintenance Technician Schools.

C. *Aviation Safety Inspector's Responsibility.* Aviation Safety Inspectors (ASIs) should not become involved in determining the market need for the school, the selection

of resource people, or materials. ASIs must remain objective in evaluating the applicant's facilities, personnel, and curriculum content. The ASI may participate as an advisor, but not as a **voting** member on school advisory boards or committees.

7. PREAPPLICATION PHASE

A. *Initial Inquiry.* Upon initial contact from an applicant the district office manager or unit supervisor will advise the applicant of the necessity for a preapplication meeting. The ASI also directs the applicant to which regulations must be met and where copies of the regulations may be obtained. The applicant is given a blank Preapplication Statement of Intent (PASI), FAA Form 8400-6 and advised where to send it. The ASI does not schedule a preapplication meeting until the applicant has reviewed these requirements and has completed the application.

B. *The PASI*

(1) The submission of a PASI expresses an intent by the applicant to initiate certification. It also allows the FAA to plan activities and commit resources. Therefore, a potential applicant should submit a copy of the PASI only after reviewing the appropriate regulations and advisory material. The applicant should consider the personnel, facility, equipment, and paperwork requirements for certification and operation.

(2) The district office manager should use the PASI to evaluate the complexity of the proposed operation and to ensure that trained and experienced ASIs are available to certificate the applicant. The district office should also use the PASI to initiate its own files on the potential applicant and to obtain a precertification number.

(3) The regional office may use the PASI to assess the district office workload and forecast staffing needs.

(4) AVN-120 maintains and assigns certificate and precertification numbers upon request. Numbers are based on the type of operation proposed, as shown on the PASI.

C. Establish Certification Team. Upon receipt of a completed PASI, the district office notifies the regional office. The district office manager or the airworthiness unit supervisor establishes a team of ASIs to conduct the certification. The team will consist of at least one Maintenance ASI from the certifying district office and one regional representative. One team member will be designated as the Certification Project Manager (CPM). Regional and/or headquarters participants should not serve as the Certification Project Manager.

(1) When requested by the regional office, AFS-300 will determine if headquarters' participation is appropriate and, within five working days of receipt of the PASI, will notify the regional office of the determination and the name(s) of any AFS-300 participants.

(2) Regional and headquarters representatives may serve as active members of the team or as advisors. These representatives should attend both the preapplication and the formal application meetings. They should be present also during facility inspections.

D. Preapplication Meeting. During the preapplication meeting, the ASI should counsel the applicant concerning regulatory requirements and FAA policies. Applicants should be made aware of any ethical considerations involved.

(1) The applicant should understand that the purpose of an Aviation Maintenance Technician School is to qualify the student to perform the duties of an aviation maintenance technician (FAR § 147.21(a)). The ASI should emphasize to the applicant, the contribution made to aviation safety by a certificated aviation maintenance technician.

(2) Applicants should be encouraged to set high goals when establishing courses. The applicant should recognize and accept responsibility to maintain high standards and continuously improve programs

NOTE: Applicants should not be forced to exceed FAR Part 147 requirements.

(3) The ASI should make an informal on-site visit to check the facilities and equipment, if available.

9. FORMAL APPLICATION PHASE. The formal application phase requires a Formal Application Meeting to present the required certification documents and discuss those issues relevant to the particular application. The Certification Project Manager meets with the official(s) representing the school. The Aviation Maintenance Technician School Certificate and Ratings Application (FAA Form 8310-6), the compliance statement, the curriculum, standards for graduation, attendance and make-up procedures, grading procedures, facility layout, and the instructor qualifications are reviewed for conformity to the regulations.

A. Compliance Statement. To benefit the applicant, the compliance statement ensures that all applicable regulatory requirements are addressed during the certification process. The compliance statement must list each applicable FAR Part 147 section and provide a brief narrative or a specific reference to a manual or other document describing the planned method of compliance with the regulation.

B. Curriculum. For guidance on curriculum requirements, refer to Vol. 2, Ch. 187, Evaluate FAR Part 147 Aviation Maintenance Technician School's Curriculum/Revision and Instructor Qualifications.

(1) Practical projects referred to in FAR § 147.21(d) include all functions specified in the curriculum that involve hands-on tasks. Therefore, practical projects should include virtually any task taught to levels 2 or 3, as specified in FAR § 147 Appendices, since all of these require some practical application.

(2) FAR § 147.38 addresses the maintenance of curriculum requirements. Generally, the Federal Aviation Regulations prescribe minimum standards for certification and operation. These standards may be exceeded, but only when approved as part of an approved curriculum.

C. List of Instructors and Qualifications. The certificate number, ratings, and subjects must be listed for each instructor. There must be at least one certificated instructor

or every 25 students in each shop or laboratory class (FAR § 147.23). The suitability of non-certificated instructors to teach certain general courses will be evaluated on an individual basis.

D. *Student Enrollment Statement.* This statement indicates the maximum number of students to be taught for each rating during each enrollment period.

E. *Written Description of Facilities.* This description must include a facility layout plan indicating the relative location of classrooms to shops/laboratories, including dimensions, and the relative location of each facility to each other facility when there is more than one site or location for the school.

F. *Inventory of Equipment, Materials and Tools.* The inventory must detail which tools will be provided by the school and which tools must be furnished by the students.

11. DOCUMENT COMPLIANCE PHASE. In the Document Compliance Phase, the applicant's manuals and other documents are reviewed thoroughly and then approved or rejected. Each document must be given an in-depth review to ensure that it complies with applicable regulations and conforms to safe operating practices.

13. DEMONSTRATION AND INSPECTION PHASE.

In this phase, the certification team makes an on-site inspection to determine whether the applicant's proposed procedures and programs are effective (see Vol. 2, Ch. 187). At this time, the applicant demonstrates that the facilities and equipment are safe and satisfactory (see Vol. 2, Ch. 188). Emphasis is on compliance with the regulations. Throughout the Demonstration and Inspection

Phase, the Certification Project Manager must ensure that each aspect of the applicant's required demonstration is first observed and then approved or disapproved.

A. Suitability of facilities, equipment, tools and materials is determined in relation to the approved curriculum. For example, an area may not be suitable for aircraft assembly. However, with appropriate scheduling and proper consideration of factors such as light, heat, noise, etc., that same area may be suitable for classroom instruction.

B. The amount of materials and the kinds of equipment and tools to be used also depend on the curriculum and number of students. For example, the applicant must demonstrate that the school has the appropriate tools and equipment to accomplish each project.

15. CERTIFICATION PHASE. An applicant is entitled to a certificate when the following have been accomplished:

- The certification process is completed
- Each unsatisfactory item has been corrected
- It is determined whether the applicant has met all regulatory requirements and understands the related responsibilities
- It has been determined whether the applicant is capable of complying with the Federal Aviation Regulations on a continuing basis
- It has been demonstrated that the applicant is capable of conducting operations in a safe manner

Section 2 Procedures

1. PREREQUISITES AND COORDINATION REQUIREMENTS

A. Prerequisites

- Knowledge of FAR Parts 43, 65 and 147

B. *Coordination.* This task requires coordination with Maintenance Aviation Safety Inspectors (ASIs), Avionics ASIs, the regional Flight Standards division, and headquarters.

3. REFERENCES, FORMS AND JOB AIDS

A. References

- Sections 313(a), 314, 601 and 607 of the Federal Aviation Act of 1958, as amended

B. *Forms*

- FAA Form 8000-4, Air Agency Certificate
- FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application
- FAA Form 8400-6, Preapplication Statement of Intent (PASI)
- Advisory Circular Form 8300-10, Certificate, Authorization, or Designation Action Request

C. *Job Aids.* None.

5. PREAPPLICATION PHASE

A. *Handle Initial Inquiry.* Upon initial contact with the applicant, determine if the proposed operation is subject to FAR Part 147. If it appears that the applicant is capable of meeting the regulatory requirements for certification, accomplish the following:

(1) Advise the applicant as to which regulations must be met and where copies of the regulations may be obtained.

(2) Provide the applicant with a Preapplication Statement of Intent (PASI), FAA Form 8400-6. Instruct the applicant to complete the PASI and submit it to the district office with jurisdiction over the area in which the facility is located.

B. *Schedule Preapplication Meeting.* Upon receipt of a completed PASI, the office manager or unit supervisor assigns a Certification Project Manager to the project. The CPM schedules a preapplication meeting and advises the applicant that key management personnel, as listed on the PASI, should attend the meeting. Inform the applicant that these key personnel must be prepared to discuss specific aspects of the applicant's proposed operation.

NOTE: This meeting may be combined with the formal application meeting, at the discretion of the Certification Project Manager.

C. *Review PASI.* The district office manager or the manager's designee reviews the PASI for completeness and accuracy.

(1) Forward two copies to the regional office for processing. The district office will obtain a precertification number from AVN-120.

(2) If a regional representative is designated to serve on the certification team, enter the name of the regional representative in the Remarks section of the PASI.

D. *Conduct Precertification Inspections.* If possible, visit the proposed school before a formal application is filed. Inspect and make necessary recommendations regarding the following:

- Classrooms
- Work areas
- Materials
- Laboratories
- Technical data
- Instructional aids
- Other areas as needed

E. *Select Certification Team Members.* The district office manager forwards a list of team members and their particular areas of specialty to the regional office.

F. *Conduct Preapplication Meeting*

(1) Ensure that the applicant is aware of the regulatory requirements and FAA policies regarding certification and operation of aviation maintenance technician schools.

(2) Inform the applicant that a formal application consists of at least the following:

(a) A letter requesting the application be processed and indicating when facilities and equipment will be ready for formal inspection

(b) Two completed copies of FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application

(c) A compliance statement listing each applicable FAR Part 147 section and providing either a brief narrative or, preferably, a specific reference to a manual or other document which describes the manner of compliance with the regulation

(d) A detailed description of the proposed curriculum. Emphasize that since the actual curriculum must be approved before certification, the applicant can save time and money by submitting the actual curriculum with the formal application.

(e) A written description of the facilities to be used for instruction. Ask the applicant to provide detailed drawings with dimensions of classrooms and laboratory/shop facilities. The drawings should show the relative location of each school facility.

(f) An inventory of the materials, equipment and tools to be used. Advise the applicant to detail which tools will be provided by the school and which must be furnished by the students.

(g) A list of instructors showing any required certificate number(s), ratings, and subjects to be taught by each. Each subject in the proposed curriculum must be accounted for on the instructor listing. Ensure that the applicant understands that technical maintenance courses other than certain general subjects must be taught by appropriately certificated Airframe and/or Powerplant Aviation Maintenance Technicians. Inform the applicant that at least one certificated instructor is required for every 25 students in each shop or laboratory class (FAR § 147.23).

(h) A statement indicating the maximum number of students to be taught for each rating during each enrollment period. This information will also be shown on the application form.

(i) The appropriate and current technical data necessary for the rating(s) sought. The procedures should demonstrate how and by whom the data will be updated. The data should include the following:

- Federal Aviation Regulations
- Type certificate data sheets
- Airworthiness Directives (ADs)
- Supplemental type certificates
- Maintenance manuals
- Advisory Circulars
- Other instructional material as required by FAR § 147

(3) Inform the applicant that three types of ratings may be issued - Airframe, Powerplant, and combined Airframe and Powerplant.

(4) Instruct the applicant to complete FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application.

(5) Ensure that the applicant understands the purpose and content of the formal application attachments.

(6) Inform the applicant that the school must have approved systems for determining final course grades and for controlling and recording attendance. Advise the applicant to present these systems to the FAA in writing for approval.

(7) The applicant must provide procedures for updating the technical data library and calibration of precision tools.

(8) Inform the applicant of administrative and recordkeeping requirements for certification.

(9) Ensure that the applicant understands FAR § 147.31, regarding crediting students for previous training and experience (see Vol. 2, Ch. 187). Inform the applicant that the school may not teach students before certification as an Aviation Maintenance Technician School and then give credit for that training after certification (FAR § 147.31(c)(1)(iv)).

(a) Ensure that the applicant understands that when granting credit for previous aviation maintenance technician **experience** (FAR § 147.31(c)(3)), only documentary evidence and testing is permitted. Emphasize that previous experience must be aviation maintenance experience and be comparable to the required curriculum subjects.

(b) Explain to the applicant that any of several methods may be used to determine the amount of credit to be given to students for previous **training** under FAR § 147.31(c)(1).

7. FORMAL APPLICATION PHASE

A. *Review the Formal Application and Attachments.*

Review the application and attachments. Determine whether all documents have been submitted and are complete.

B. *Schedule and Conduct Formal Application Meeting.*

Meet with key school personnel to discuss submitted formal application. Resolve any open questions or discrepancies at this time.

C. *Accept or Reject Formal Application.* Based on the initial review of the application and any meetings with the applicant, accept or reject the application. Advise the applicant in writing of the results. If the application is rejected, return the application and attachments with a letter stating the reasons for rejection.

9. DOCUMENT COMPLIANCE PHASE

A. *Review Documents.* Thoroughly review the applicant's curriculum and other documents to ensure that each complies with the applicable regulations. Approve, accept, or reject each document as appropriate. Documents reviewed during this phase may include the following:

- FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application
- The compliance statement
- Curriculum (FAR § 147.21)
- Instructor requirements and qualifications (FAR § 147.23)
- Minimum standards for graduation and method of determining final grades (FAR § 147.31)
- Procedures for recording and controlling attendance, and provisions for makeup classes (FAR § 147.31)
- Written procedures for taking FAA written, oral and practical tests and for recordkeeping requirements found in FAA Order 8610.4, Chapter 5
- Procedures for maintaining, keeping, and distributing student records and transcripts (FAR § 147.33)
- Procedures for updating technical data library and calibration of precision tools
- Facility layout

B. *Document Deficiencies.* If deficiencies are found in any document submitted by the applicant, return the document with a letter outlining the deficient areas.

NOTE: The certification team should be ready to offer suggestions on how to improve the product but should avoid “writing” the applicant’s documents.

C. If Necessary, Terminate the Certification Process.

If the documents are of insufficient quality, advise the applicant that continuing the certification project is impractical and schedule a meeting with the applicant to discuss each deficiency in detail.

(1) Complete item 13 of FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application, by checking “disapproved,” or by indicating that the application was withdrawn, as appropriate.

(2) Return the application with a letter advising the applicant of the reasons for termination. Advise the applicant that a new PASI is required to initiate the certification process again.

(3) Forward two copies of the letter to the regional office, which will forward one copy to AFS-300.

(4) Notify AVN-120 that the project has been terminated.

11. DEMONSTRATION AND INSPECTION PHASE

A. Observe Demonstrations and Conduct Inspections.

Ensure that the applicant’s proposed procedures and programs are effective, and that facilities and equipment are safe and satisfactory. Follow the procedures in Vol. 2, Ch. 188. Ensure compliance with the regulations as follows:

- Facilities meet the requirements of FAR §§ 147.13 and 147.15
- Instructional aids meet the requirements of FAR § 147.17
- Materials, tools, and shop equipment meet the requirements of FAR § 147.19

B. Document Deficiencies. If deficiencies exist, provide a list of discrepancies to the applicant. Schedule a meeting to discuss in detail the appropriate corrective action to be taken. Place documentation in the certification file.

(1) If the applicant does not demonstrate compliance or if discrepancies cannot be resolved, send a letter of rejection and a list of discrepancies.

(2) Inform the applicant that the Certification Project Manager must be notified in writing of all corrective action taken.

13. CERTIFICATION PHASE

A. Issue Certificate. When all regulatory requirements have been met, accomplish the following:

(1) Complete Block 13 of FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application.

(2) Approve the curriculum by signing and dating the list of effective pages and revision pages.

(3) Obtain a final certificate number from AVN-120.

(4) Prepare an Air Agency Certificate, FAA Form 8000-4. Ensure that the certificate is signed by the district office manager. Give the original certificate to the new certificate holder.

(5) Prepare and process a “Certificate, Authorization, or Designation Action Request,” Advisory Circular Form 8300-10.

B. Prepare Certification File. Once the school is certified, prepare a district office file. The file must include the name and title of each ASI who assisted in the certification. The file is signed by the Certification Project Manager. The file shall contain at least the following:

(1) Copy of the PASI

(2) Completed FAA Form 8310-6, Aviation Maintenance Technician School Certificate and Ratings Application

(3) The compliance statement

(4) Copy of the Air Agency Certificate issued

(5) Copy of the approved curriculum

(6) List of the instructors, their qualifications, and the courses they will be teaching

(7) Facility layout

(8) Procedures for updating the technical data library and calibration of precision tools

(9) Summary of any difficulty encountered during certification

C. *Distribute Application Form 8310-6.* Distribute FAA Form 8310-6, retaining the original form in the district office and forwarding two copies to the regional office, which forwards one copy to AFS-300.

15. TASK OUTCOMES

A. *Complete PTRS Transmittal Form*

B. Completion of this task will result in one of the following:

- Issuance of an air agency certificate
- A letter to the applicant indicating that the certificate is denied
- A letter to the applicant confirming termination of the certification process by the applicant

17. FUTURE ACTIVITIES

A. Observe the school during the first 90 days of operation.

B. Additional inspections may be necessary to determine compliance with the applicable Federal Aviation Regulations.

C. The ASI may direct changes in the methods or techniques of operation